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Counsel for Defendant

JULIO CESAR ROMAN TORRES

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR ROMAN TORRES,

Defendant.

No. 23-CR-491-JD

**STIPULATION AND ~~PROPOSED~~
ORDER FOR CONTINUANCE OF
STATUS HEARING AND EXCLUSION OF
TIME**

Defendant Julio Cesar Roman Torres, by and through his counsel, Alanna Coopersmith, and the government, by and through Assistant United States Attorney, Charles Bisesto, stipulate and agree as follows:

The next status hearing is set for December 16, 2024.

Defense counsel is unable to attend that status hearing. In a matter defense counsel is handling, due to the unavailability of a prosecution witness, a no-time-waiver preliminary hearing in state court was continued to December 16, 2024.

Counsel continues to review the discovery, discussing the best ways to proceed in light of the evidence, with the defendant and a Spanish interpreter.

The parties are engaged in settlement discussions, including the exchange of information and materials relevant to a negotiated resolution.

For these reasons, the parties stipulate and agree to a continuance of the status hearing from

December 16, 2024 to January 13, 2025.

The parties further agree that the period from December 16, 2024 through January 13, 2025, should be excluded from the time in which to commence trial under the Speedy Trial Act on the basis of effective preparation of counsel and continuity of counsel. 18 U.S.C. § 3161(h)(7)(A),(B)(iv).

IT IS SO STIPULATED.

Dated: December 6, 2024

s/ Alanna Coopersmith

ALANNA COOPERSMITH

Counsel for Defendant

JULIO CESAR ROMAN TORRES

ISMAIL RAMSEY

United States Attorney

Dated: December 6, 2024

s/ Charles Bisesto

CHARLES BISESTO

Assistant U.S. Attorney

~~PROPOSED~~ ORDER

Based upon the foregoing stipulation, for good cause shown, it is hereby Ordered that the status hearing of December 16, 2024, is continued to January 27, 2025, at 10:30 a.m. It is further Ordered that the time from December 16, 2024 through January 27, 2025, is excluded from the time period in which to commence trial under the Speedy Trial Act on the basis of effective preparation of counsel, taking into account the exercise of due diligence, and continuity of counsel. 18 U.S.C. § 3161(h)(7)(A),(B)(iv). The Court finds the ends of justice served by an exclusion of time outweigh the best interests of the public and defendant in a speedy trial. *Id.* § 3161(h)(7)(A).

IT IS SO ORDERED.

Date: December 10, 2024



JAMES DONATO

United States District Judge